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July 24, 2020

Electronic Mail

Behram V. Parekh
KIRTLAND & PACKARD LLP
1638 South Pacific Coast Highway
Redondo Beach, CA 90277
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Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*
USDC, District of New Jersey, No. 1:19-md-2875-RBK-JS

Dear Behram:

I write on behalf of Mylan to confirm the representations made on the record during the July 15 status conference that Mylan intends to utilize a continuous multi-modal learning ("CMML") platform to assist with the review and production of Mylan's electronically stored information ("ESI"). As you are aware, the use of machine-learning technology that prioritizes relevant documents based on human input is now common in litigation involving a high volume of ESI. Leveraging the CMML platform in this case will enable Mylan to be more efficient in its review of ESI and prioritize the production of responsive documents to the Plaintiffs.

At this stage of its custodial ESI review, Mylan will not be limiting the pool of documents to be reviewed based on machine-learning. Nevertheless, to the extent that the CMML platform ultimately identifies a set of documents that are unlikely to be responsive, Mylan reserves its right to meet-and-confer with Plaintiffs in order to limit the manual review of non-responsive documents.

To the extent you have any questions about our approach, please do not hesitate to contact me.

Very truly yours,



Clem C. Trischler

Behram V. Parekh

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c: valpec@kirtlandpackard.com

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